

J Christopher Jorgensen
Nevada Bar No. 5382
Brittini A. Tanenbaum
Nevada Bar No. 16013
LEWIS ROCA ROTHGERBER CHRISTIE LLP
3993 Howard Hughes Parkway, Suite 600
Las Vegas, NV 89169
Tel: 702.949.8200
Fax: 702.949.8398
CJorgensen@lewisroca.com
BTanenbaum@lewisroca.com

Attorneys for Defendant Synchrony Bank

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KRYSTA TREMKO,

Plaintiff,

v.

CAPITAL BANK; CHEX SYSTEMS, INC.;
CLARITY SERVICES, INC.; DISCOVER
BANK; DISH NETWORK L.L.C.; EQUIFAX
INFORMATION SERVICES, LLC;
EXPERIAN INFORMATION SOLUTIONS,
INC.; FACTOR TRUST, INC.; KOHL'S /
CAPONE; MASON COMPANIES INC.;
SYNCHRONY BANK; and TRANS UNION
LLC,

Defendants.

Case No.: 2:24-cv-00307-APG-MDC

**STIPULATION AND PROPOSED ORDER
FOR EXTENSION OF TIME TO FILE
JOINT PRETRIAL ORDER**

(First Request)

Pursuant to Fed. R. Civ. P. 6(b) and LR IA 6-1 and LR 26-3, Plaintiff Krysta Tremko and Defendant Synchrony Bank, by and through their undersigned counsel, respectfully stipulate to and request a fourteen (14) day enlargement of time to file the Joint Pretrial Order. In support thereof, the parties provide the following:

1. The Joint Pretrial Order is currently due to the Court on November 8, 2024 [ECF No. 77].

2. The parties acknowledge that this stipulation is being filed within 21 days of the applicable deadline and thus, requires a showing of good cause. LR 26-3.

3. Counsel for the parties have been in good-faith settlement discussions to try to resolve the case and obviate the need for further litigation. Therefore, counsel for the parties have conferred and agreed to jointly seek a modest extension of time to allow additional time for continued settlement discussions.

4. This stipulation is made in good faith and not for purposes of undue delay. This is the parties' first extension request, and no party will be prejudiced by the relief sought.

5. The parties therefore respectfully request this Court extend the time to file the Joint Pretrial Order to, and including, November 22, 2024.

IT IS SO STIPULATED.

DATED this 5th day of November, 2024.

/s/ Brittni A. Tanenbaum

J Christopher Jorgensen, Esq.
Brittni A. Tanenbaum, Esq.
Lewis Roca Rothgerber Christie LLP
3993 Howard Hughes Parkway, Suite 600
Las Vegas, NV 89169

/s/ Miles N. Clark

Miles N. Clark, Esq.
Law Offices of Miles N. Clark, LLC
5510 S. Fort Apache Rd., Suite 30
Las Vegas, NV 89148

Attorneys for Defendant Synchrony Bank

Attorneys for Plaintiff Krysta Tremko

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: _____

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of November, 2024, I caused the foregoing
**STIPULATION AND PROPOSED ORDER FOR EXTENSION OF TIME TO FILE
JOINT PRETRIAL ORDER** to be electronically filed with the Clerk of the Court by using
CM/ECF system, which will send a notice of electronic filing to counsel of record.

/s/ Lisa M. Noltie

An Employee of Lewis Roca Rothgerber Christie